

EXHIBIT 7

Hannah Nilles Highly Confidential

June 30, 2025

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

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IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT LITIGATION

Case no. 3:23-md-03084-CRB

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*** HIGHLY CONFIDENTIAL ***

VIDEOTAPED DEPOSITION

OF

HANNAH NILLES

Monday, June 30, 2025

10:35 a.m.

Reported by:

ROBERTA CAIOLA

Stenographic Reporter

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1 on lawmakers, regulators that are interested in
2 public safety, it's relying on Uber, yes, to be
3 complying to those regulations. All of the
4 above.

5 Q. Including what Uber itself says,
6 right?

7 MR. PREMO-HOPKINS: Object to form.

8 Q. Uber knows that people rely on what
9 Uber says?

10 MR. PREMO-HOPKINS: Object to form.

11 A. Among other things.

12 Q. Okay. Uber has told riders and the
13 public that its screening process is very
14 thorough, correct?

15 MR. PREMO-HOPKINS: Object to form.

16 A. I don't think I'm aware of all the
17 marketing statements that we have made, but if
18 you say -- you're referring to a specific
19 thing, then, yes.

20 Q. And Uber has told riders and the
21 public that its background checks are rigorous?

22 A. I would assume so, yes.

23 Q. Uber has told riders and the public
24 that its driver screening is robust?

25 A. Again, I don't know specifically

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1 what public-facing statements you're referring
2 to, but I'm going to take your word for it.

3 Q. Okay. Uber has told riders and the
4 public that it vets drivers?

5 A. Yes.

6 Q. Uber tells riders and the public
7 that its drivers go through a multistep safety
8 screen, right?

9 A. Yes.

10 MR. PREMO-HOPKINS: Object to form.

11 Q. And Uber knows that its business
12 depends on people trusting that they are
13 successfully screening out bad actors, right?

14 MR. PREMO-HOPKINS: Object to form.

15 A. I would actually say awareness of
16 our screening practices is very low, despite
17 our efforts to educate people. So I don't know
18 if people rely on that or not.

19 Q. Okay. Uber has studied how
20 perception of safety drives people's behavior,
21 right?

22 A. That's true.

23 Q. And Uber studied how perception of
24 safety drives travel patterns?

25 MR. PREMO-HOPKINS: Object to form.

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1 their history that was reported to police and
2 was an actual conviction, then that would show
3 up on their record.

4 Q. But if -- as a general matter, Uber
5 is not looking to any driver's educational
6 records or background to see if, in fact, they
7 have received any disciplinary measures for
8 sexual assault or misconduct, other than what
9 may ultimately come through in a police
10 background check?

11 A. I'm not sure --

12 MR. PREMO-HOPKINS: Object to form.

13 A. -- how we would get that information
14 or if it would even be legal; but, no.

15 Q. All right. Uber does not review
16 whether parties were any -- as part of Uber's
17 screening, it does not review whether
18 parties -- whether drivers were parties to any
19 civil lawsuits; is that right?

20 MR. PREMO-HOPKINS: Object to form.

21 A. If it's not a criminal charge, then
22 I suppose I don't -- I don't know. I think it
23 would not be considered.

24 Q. Uber doesn't -- as part of its
25 screening, it doesn't consider whether the

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1 right?

2 MR. PREMO-HOPKINS: Object to form.

3 A. Not to my knowledge.

4 Q. Uber doesn't do any drug testing or
5 require any drug testing results as a
6 prerequisite to driving; is that correct?

7 A. We do have -- I mean, obviously, we
8 have screening criteria, and if somebody has a
9 conviction that's disqualifying related to
10 drugs, they would be disqualified.

11 We also have, while they are on the
12 platform, drug testing processes to exonerate
13 somebody who's been the victim of a false
14 report.

15 Q. Understood.

16 A. But not prior to joining, no.

17 Q. Right. Prior to joining Uber, Uber
18 does not require a driver to undergo drug
19 testing, except in limited circumstances, where
20 they may have had a past history of criminal
21 conviction related to prior substance abuse,
22 right?

23 A. Yes.

24 Q. Okay. Uber doesn't consider in
25 its -- in Uber screening, it doesn't review

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1 **medical -- excuse me -- military records?**

2 MR. PREMO-HOPKINS: Object to form.

3 A. Not to my knowledge.

4 **Q. Uber doesn't interview any**
5 **candidates, as a general matter, right?**

6 A. That's right.

7 **Q. Most drivers apply online; is that**
8 **right?**

9 A. Yes.

10 **Q. And Uber doesn't check any**
11 **references for Uber drivers as part of its**
12 **screening?**

13 A. We do not request references, no.

14 **Q. And Uber does not do a Google search**
15 **of the drivers before -- as part of their**
16 **screening?**

17 A. Through our background check
18 provider, Checkr, they're doing a very
19 extensive search, looking at
20 privately-purchased records, so they may be
21 doing various searches; but, as Uber employees,
22 are not doing a Google search of every driver,
23 no.

24 **Q. Okay. Is it your testimony that**
25 **Uber's third-party system, Checkr, does do**

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1 checks to ensure that people who are Uber
2 drivers have valid SSNs and it checks that with
3 the United States Government.

4 Is it a requirement, as a screening
5 matter, that Uber determine that the driver is,
6 in fact, a citizen of the United States?

7 MR. PREMO-HOPKINS: Object to form.

8 A. I have told you what the requirement
9 is, and that is that you have to have a United
10 States social security number that is valid
11 with the IRS.

12 Q. Okay. Uber doesn't check background
13 criminal history or motor vehicle history in
14 any country, other than the United States, for
15 drivers who are applying in the U.S., no matter
16 how recently that they've -- have been in this
17 country?

18 A. That's not totally true. We don't
19 do bespoke searches in the country -- in some
20 other country.

21 However, Checkr has international
22 watch lists and things that they're checking
23 for.

24 Q. Okay. So other than the Checkr's --
25 so let's just go through those.

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1 question was terrible, and I will take the
2 note from counsel, but I didn't like the
3 speaking objection.

4 Q. All right. Ms. Nilles, I want to
5 talk about what Uber does do to screen out
6 potential sexual predators.

7 I believe we went over this earlier.

8 But Uber's screening entails running
9 a background check, correct?

10 A. We run a background check, yes.

11 Q. And that is using the third-party,
12 Checkr, right?

13 A. Yes.

14 Q. That is a name-based background
15 check?

16 A. Yes.

17 Q. Uber does not run any kind of
18 fingerprinting-based background checks?

19 A. No.

20 Q. That was a double negative.

21 But Uber --

22 A. We don't run fingerprinting tests,
23 but we do run name-based checks, yes.

24 Q. All right. And other than
25 background checks for its screening --

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1 Right?

2 A. Yes.

3 Q. And "Action:" It says: "Upgrade
4 our Checkr package to access records for
5 residence history for a person's lifetime in
6 all places." That's a -- "Note: This won't
7 always be fool proof or exhaustive because
8 records aren't always updated or maintained as
9 we know."

10 That's what it says for "Action,"
11 right?

12 A. Yes, which is why we have an nat
13 crim database.

14 Q. Okay. Now, it says -- well, hold
15 on.

16 When you say "that's why we have the
17 nat crim database, that's not what it says on
18 this page, right?

19 It just says --

20 A. Yes, it does. It says "...as well
21 as criminal records flagged through national
22 databases."

23 That's nat crim.

24 Q. Oh, I see. Okay. That's right.
25 You're right. Okay. So --

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1 CERTIFICATE

2

3 STATE OF NEW YORK)

4 : ss

5 COUNTY OF BRONX)

6

7 I, ROBERTA CAIOLA, a Certified

8 Shorthand Reporter, do hereby certify:

9 That HANNAH NILLES, the witness
10 whose deposition is hereinbefore set forth, was
11 duly sworn by me and that such deposition is a
12 true record of the testimony given by the
13 witness.

14 I further certify that I am not
15 related to any of the parties to this action by
16 blood or marriage, and that I am in no way
17 interested in the outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto
19 set my hand on July 1, 2025.

20

21

Roberta Caiola

22

ROBERTA CAIOLA

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